

IN RE:	:	
WALTER R. WHITE, III	:	CASE NO. 1:19-bk-05177-HWV
Debtor	:	
	:	CHAPTER 13
TOYOTA MOTOR CREDIT	:	
CORPORATION	:	
Movant	:	
	:	
v.	:	
	:	
WALTER R. WHITE, III	:	
Respondent	:	

AND NOW, comes Debtor, Walter R. White, III, by and through his attorney, Gary J.

THE PARTIES

- ## JURISDICTION AND VENUE

- ## FACTUAL BACKGROUND

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7. Admitted in part and denied in part. The Note speaks for itself. Strict proof is demanded.

8. Admitted.

9. Admitted in part and denied in part. Debtor made a payment in December. Accordingly, he believes he is now three payments behind. In this regard, Debtor requests a post-petition payment history to confirm same. Debtor can pay the remainder of the arrearage by the end of February from his federal income tax refund.

10. Admitted in part and denied in part. Debtor has no knowledge. Strict proof is demanded.

11. Admitted in part and denied in part. Debtor believes and hereby avers that at the time of the filing of the bankruptcy the vehicle was worth \$15,409.00.

12. Denied. Debtor is providing adequate protection through regular monthly payments. To the extent that the monthly payments are behind, Debtor will make an offer in the near future to bring the payments current. Further, there is a substantial equity cushion providing adequate protection to Movant.

13. **WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtor

DATED: 1/30/2024

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF TOYOTA MOTOR CREDIT CORPORATION FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

KERI P. EBECK, ESQUIRE
BERNSTEIN-BURKLEY, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

Carol V. Shay

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For Debtor

DATED: 1/30/2024